

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EUGENE VOLOKH, RUMBLE CANADA  
INC., and LOCALS TECHNOLOGY INC.,

*Plaintiffs,*

v.

LETITIA JAMES, in her official capacity as  
New York Attorney General,

*Defendant.*

Civil Action No.: 1:22-cv-10195-ALC

**NOTICE OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

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PLEASE TAKE NOTICE THAT Plaintiffs Eugene Volokh, Rumble Canada Inc., and Locals Technology Inc. respectfully move, under Federal Rule of Civil Procedure 65(a), for an order preliminarily enjoining Defendant Letitia James from enforcing New York General Business Law § 394-ccc during the pendency of this action, and for such other and further relief as the Court deems just and proper. In support of this motion, Plaintiffs rely on the following documents:

- (1) Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction;
- (2) Declaration of Darpana Sheth in Support of Plaintiffs' Motion for a Preliminary Injunction, and accompanying exhibits; and
- (3) Verified Complaint for Declaratory and Injunctive Relief.

Plaintiffs respectfully request oral argument on this motion before the Honorable Andrew L. Carter, Jr., at the United States Courthouse, 40 Foley Square, New York, New York 10007.

Respectfully Submitted,

Date: December 6, 2022

/s/ Darpana M. Seth

DARPANA M. SHETH

(New York Bar No. 4287918)

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(California State Bar No. 329866)

JAMES M. DIAZ\*

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*\*Pro Hac Vice* Motions Forthcoming

\*\* S.D.N.Y. Admission Pending

**CERTIFICATE OF SERVICE**

Plaintiff's counsel confirms that a true and correct copy of the foregoing was served via the Court's electronic filing system on this day, December 6, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system

DATED: December 6, 2022

Respectfully submitted,

/s/ Darpana Sheth

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